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Memorandum of Conference on Triforine SUBJECT

John H Onley Juin John H. Onley, Ph.D., Chemist FROM Residue Chemistry Branch, HED (TS-769

To Willa Garner, Ph.D., Acting Chief Residue Chemistry Branch, HED (TS-769)

J. Onley for A.S. Quick THRU: Robert S. Quick, Section Head Petition Evaluation Section Residue Chemistry Branch, HED (TS-769)

Residue Chemistry Branch, HED (TS-769)

On December 1, 1980, a conference on triforine was held between:

S. Pouliot EM Industries, Inc. H. Knoll EM Industries, Inc. H. Jacoby Registration Division

Residue Chemistry Branch, HED R. Quick J. Onley Residue Chemistry Branch, HED

In essence, the conference dealt with our reviews on the following petitions:

- 1. OF2151 Triforine on Stone Fruits.
- OF2152 Triforine in or on tomatoes, peppers, eggplants, strawberries, melons and cucumbers.
- OF2153 Triforine in or on almonds and apples.

During the proceedings of the meeting, EM Industries, Inc., made the following commitments:

Petition No. OF2351

- 1. Section B will be revised wherein the maximal application rate will be 0.6 lb. (9.6 ozs. a.i.)/A.
- 2. With the exception of California, the proposed use on peaches, nectarines and apricots will contain a maximal of 3 blossom plus 3 pre-harvest applications. In California, the proposed use will contain no more than 3 blossom + 2 pre-harvest + 1 post-harvest applications per growing season.
- The proposed use pattern will contain a maximal dipping time and will state dosage in terms of pounds of fruit to be dipped in gallons of solution or treated with pounds or grams of product.

- 4. Revised Section F wherein the proposed tolerances on peaches, nectarines and apricots will be 8 ppm.
- 5. A revised Section B/label will contain a post-harvest restriction on plums that are to be dried.
- 6. The petitioner will submit an explanation as to why spray applications of Funginex WP formulations will yield higher triforine residues than the Funginex Emulsifiable Concentrate formulation.

Petition No. OF2352

- la. The petitioner will provide more proof that will show tomatoes imported from Mexico will be used only on the fresh market. If this cannot be shown, a tomato processing study along with tolerances/ food additive tolerances (if needed) on tomatoes and tomato fractions will be submitted at a later time.
- 1b. A large animal (lactating ruminant) metabolism/feeding study will be submitted if it cannot be shown that Mexican tomatoes are only used on the fresh market.
- 2. Sections B and F will be revised; the petitioner will propose the establishment of tolerances for triforine residues on the following raw agricultural commodities:

| peppers, bell | 5.0 ppm |
|------------------------|---------|
| eggplants | 1.0 ppm |
| strawberries | 2.0 ppm |
| cantaloups/watermelons | 1.0 ppm |
| cucumbers | 0.5 ppm |

Petition No. OF2353

- 1. Residue data will be submitted on dry apple pomace.
- 2. A revised Section F will contain the following proposed tolerances:

| Almond | 0.01 ppm |
|-------------------|------------------------|
| Almond, hulls | 0.1 ppm |
| apples | 0.1 ppm |
| apple pomace, wet | 0.4 ppm |
| apple pomace, dry | (unknown at this time) |

3. A large animal (lactating ruminant) metabolism/feeding study will be submitted.

TS-769:RCB:J. Onley:gs:CM#2:RM810:12/6/80 cc: RF, Circ., J. Onley, Watts, Jacoby, Barton, FDA, TOX, EEB, PP#s 2151, 2152, 2153 RDI: Robert S. Quick:12/4/80